

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

Counsel for BMST, Inc. and Mark Beltrami

Impress Successor Liability, and Obtain an Order of Substantive Consolidation filed contemporaneously herewith, seeking dismissal of all Counts asserted against the BMST Defendants, request that the Court enter an Order: (i) granting this Motion to Dismiss; (ii) dismissing Counts V, VI, VII, VIII, IX, and XI, *with prejudice*, and (iii) granting such other and further relief as the Court deems just and proper.

Dated: November 2, 2018

Respectfully submitted

BMST, INC. and MARK BELTRAMI

/s/ Franklin R. Cragle, III
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2018, a true and complete copy of the foregoing Motion was filed and served electronically using the Court's ECF System and was also sent by e-mail and first class mail, postage prepaid, as follows:

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